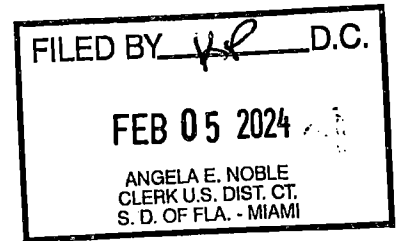


**UNITED STATE DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF FLORIDA**

24-cv-20448-JAL



JANE DOE (LJ)

(L.M), as the Natural Parent of JANE DOE (L.J)

PLAINTIFF

V

THE MIAMI - DADE COUNTY DISTRICT SCHOOL BUS

JANINE ANN. TOWNSELY (GREYNOLDS PARK ELEM SCHOOL PRINCIPAL)

MIAMI- DADE COUNTY SCHOOL BOARD FOUNDATION INC

DEFENDANTS

_____ /

COMPLAINT AND JURY DEMAND

COMES NOW, JANE DOE (LJ) FILES THIS MOTION TO THIS COURT BASED ON THE CLAIMS THAT ARE RAISED IN THIS MOTION.

JANE DOE (LJ) IS FILING THIS LAWSUIT BASED ON SEXUAL ASSAULT MOLESTATION ABUSE TRAUMA SHE HAVE SUFFERED TO WHICH JANE DOE (LJ) HAS A REGULAR SESSIONS WITH THERAPIST OVER AN EXTENDED PERIOD.

JANE DOE (LJ) IS SEEKING A 90 MILLION DOLLARS IN DAMAGES NEGLIGENCE AND NEGLIGENT INFLICTIONS OF EMOTIONAL DISTRESS ABUSE OF A MINOR DISABLED CHILD.

CLAIMS

THE ABOVE NAMES IN THIS COMPLAINT MOTION HAVE VIOLATED JANE DOE (LJ) CIVIL RIGHTS ACT AS THE FOLLOWING.

1. DISCRIMINATION ACT 1964.
2. THE AMERICAN WITH DISABILITES ACT (ADA). (ADA II.) (ADA III.)
3. TITLE VI (6) OF THE EDUCATION AMENDMENT OF 1972.
4. INDIVIDUALS WITH DISABILITIES EDUCATION ACT.

STATEMENT OF FACTS

ON FEBURARY 25, 2020 MIAMI DADE SCHOOL POLICE OFFICER LOWERY ANTONIO, RESPONDED TO GREYNOLDS PARK ELEMENTARY SCHOOL IN REFERENCE TO INAPPROPRIATE SEXUAL ASSUALT BEHAVIOR INCIDENT THAT WAS COMMITTED ON THE MIAMI -DADE COUNTY PUBLIC DISTRICT SCHOOL BUS.

JANE DOE (LJ) WAS A STUDENT AT THE SCHOOL WHO WAS IN KINDERGARTEN THAT WAS CONSIDERED TO BE A STUDENT WITH SPECIAL NEEDS THAT IS CALLED EMOTIONALLY BEHAVIORAL DISORDER (EBD).

ACCORDING TO THE POLICE REPORT JANE DOE WAS (LJ) ON THE MIAMI DADE COUNTY PUBLIC DISTRICT SCHOOL BUS BEING TRANSPORTED TO GREYNOLDS PARK ELEMENTARY SCHOOL. DURING HER RIDE TO SCHOOL JANE DOE (LJ) WAS SEXUALLY MOLESTED BY TWO (2) OLDER MALE MINORS.

BOTH MINORS SEXUALLY MOLESTED JANE DOE (LJ) AS THEY PULLED DOWN HER PANTS AND HAD HER SIT ON THEIR LAPS WHILE BEING SEXUALLY ASSAULTED.

THE STUDENTS THAT WERE ON THE BUS WITNESS THE INCIDENT AND IMMEDIATELY REPORT THE INCIDENT TO ONE OF THE SCHOOL STAFF MEMBERS ONCE ARRIVED AT THE SCHOOL.

OFFICER LOWERY ARRIVED AT THE SCHOOL AND MADE CONTACT WITH THE SCHOOL PRINCIPAL MS TOWNSLEY SHE PROVIDED THE DETAILS THAT WAS PROVIDED TO HER FROM THE STUDENTS THAT WERE ON THE SCHOOL BUS.

OFFICER LOWERY MADE CONTACT WITH THE MINORS THAT SEXUALLY MOLESTED JANE DOE (LJ). THE FIRST MINOR STATED HE DID PULL DOWN JANE DOE (LJ) PANTS A LITTLE BIT AND PLACE HER ON HIS LAP AND THEN PASSED HER ONTO THE NEXT MINOR.

THE SECOND MINOR STATED HE DID NOT DO ANYTHING THE FIRST MINOR DID IT.

OFFICER LOWERY TOOK STATEMENTS FROM ALL THE STUDENTS THAT WITNESS THE INCIDENT ON THE SCHOOL BUS.

OFFICER LOWERY CONSIDER THE INCIDENT THAT OCCURRED ON THE SCHOOL BUS A VERY SERIOUS MATTER TO WHICH HE DECIDED TO CALL THE STATE ATTORNEY OFFICE ON FILING CRIMINAL CHARGES ON THE MINORS, HOWEVER THE STATE ATTORNEY DENIED THE REQUEST.

THE PARENTS OF THE MINORS THAT WERE INVOLVE IN THE INCIDENT WAS CONTACTED AND RELEASED TO THEIR PARENTS EARLY OF THE DAY.

JANES DOE (LJ), MOTHER WAS UNAWARE OF THE INCIDENT THAT TOOK PLACE ON THE MIAMI DADE COUNTY DISTRICT SCHOOL BUS THROUGHT OUT THE DAY BECAUSE JANE DOE'S PARENTS WAS NOT CONTACTED.

JANE DOE (LJ) WAS DROP-OFF BY THE SCHOOL BUS AS NORMAL ROUTINE, JANE DOE (LJ) INFORM HER MOTHER OF THE INCIDENT AND IMMEDIATELY THE MOTHER CALLED THE SCHOOL, SHE WAS TOLD THEY WILL RETURN HER PHONE CALL WITHIN AN HOUR LATER JANE DOE (LJ), MOTHER RECEIVED A PHONE CALL FROM THE SCHOOL PRINCIPAL MS TOWNSLEY, WHICH SHE ARRANGED A

MEETING WITH THE MOTHER OF JANE DOE (LJ) TO BE ARRANGED THE FOLLOWING MORNING FEBURARY 26,2020.

ON FEBRURARY 25,2020 A DCF INVESTIGATOR SOCIAL WORKER FROM DEPARTMENT CHILDRENS FAMILIES ARRIVED AT JANE DOE (LJ) RESIDENT TO INVESTIGATE THE ALLEGATIONS THAT WAS REPORTED.

ACCORDING TO THE DCF INVESTIGATION REPORT, THE MINORS WHO MOLESTED JANE DOE (LJ) WERE BOTH 11 YEARS OLD, WHILE JANE DOE WAS ONLY 5 YEARS OLD. BOTH MINORS HAD PREVIOUS PRIORS WITHIN THE DEPARTMENT OF CHILDREN & FAMILIES REGARDING THE INCIDENT THAT OCCURRED.

ONE OF THE MINOR HAD NO KNOWLEDGE OF SEXUAL BEHVIOIRS, HOWEVER THE OTHER MINOR WAS FULLY AWARE OF WHAT IS SEXUAL BEHAVIOR, HE STATED HE HAVE RESEARCH THE WORD AND WATCHING PORNOGRAPHY, HE WAS AWARE WHAT WERE WOMAN AND MALE BODY PARTS ARE, HE ALSO WAS ABLE TO DESCRIBE THE SOUNDS THAT ARE MADE DURING INTERCOURSE.

THE MOTHER OF JANE DOE (LJ) WAS FULLY BRIEF ON THE INCIDENT THAT OCCURRED ON THE SCHOOL BUS, AND WAS CONVINCED THE SCHOOL PRINCIPAL MS TOWNSLEY WAS GOING TO EXPEL BOTH MALE MINORS FROM RETURNING TO SCHOOL AS THE PRINCIPAL STATED.

HOWEVER, THERE WAS NO DISCIPLINARY ACTIONS THAT WAS EVER TAKEN .ONE OF THE (WHITE MALE) ASSUALTERS MINORS WAS STILL ATTENDING THE SCHOOL GREYNOLDS PARK ELEMENTARY SCHOOL YEAR (EBD) PROGRAM 2020-2021 AND THE SCHOOL BUS.

THE MOTHER OF JANE DOE (LJ) CALLED THE MIAMI- DADE COUNTY SCHOOL BUS ADMINISTRATION TO COMPLAINT TO HAVE HER CHILD BE REMOVED FROM THE SCHOOL BUS UPON LEARNING THAT ONE OF THE MINOR WAS STILL ATTENDING THE SCHOOL BUS.

FUTHERMORE, THE PRINCIPAL MS TOWNSLEY AT GREYNOLDS PARK ELEMENTARY SCHOOL LIED TO MS JANE DOE'S (LJ) MOTHER TO FORCE JANE DOE

TO BE REMOVED FROM THE SCHOOL DUE TO A PROGRAM THAT WAS PLACED IN THE SCHOOL FOR CHILDREN THAT ARE CONSIDERED TO BE EMOTIONALLY. BEHAVIORALLY. DISABLED (EBD) PROGRAM, THAT WAS TO BE REMOVED FROM THE SCHOOL PROGRAM CURRICULUM.

HOWEVER, THE (EBD) PROGRAM WAS NEVER REMOVED FROM GREYNOLDS PARK ELEMENTARY SCHOOL.

CLAIM (1)

1. THE PRINCIPAL AT GREYNOLDS PARK ELEMENTARY SCHOOL VIOLATED JANE DOE (LJ) CIVIL RIGHT ACT UNDER THE FEDERAL LAW.
2. JANE DOE (LJ) WAS DISCRIMATED ON THE BASIS OF HER RACE, THE PRINCIPAL MS JANINE ANN. TOWNSLEY, ALLOWED ONE OF THE STUDENT THAT MOLESTED JANE DOE (LJ) TO REMAIN IN THE SCHOOL AND ON THE SCHOOL BUS THROUGHOUT THE SCHOOL YEAR.
3. THIS STUDENT IS (WHITE) WHO ADMITTED COMMITTING MOLESTING JANE DOE (LJ) ON THE SCHOOL BUS.
4. JANE DOE (LJ) DID NOT RECEIVE THE PROPER TREATMENT AND FAIRNESS AS A STUDENT OF (COLOR). IF JANE DOE WAS A (STUDENT) THAT BEEN MOLESTED BY A (BLACK) STUDENT PROPER TREATMENT WOULD HAVE BEEN RECEIVED PROPERLY CONDUCTED.
5. AS THE SCHOOL PRINCIPAL MS. TOWNSLEY DID NOT PROVIDE JANE DOE (LJ) ANY MEDICAL TREATMENT REMEDY TO CONFIRM THAT SHE WAS IN GOOD HEALTH. HOWEVER, THERE WAS NO DISCIPLINE ACTION THAT WAS TAKEN INTO MATTER THAT OCCURRED ON THE SCHOOL BUS NOR THE STUDENTS THAT WAS INVOLVED.
6. THE PRINCIPAL MS JANINE ANN. TOWNSLEY ENABLED A PEDOPHILE LEARNING ENVIROMENT ATMOSPHERE FOR JANE DOE (LJ) WHICH SHE NEGLECTED THE DUTY OF CARE OF JANE DOE(LJ) AS A STUDENT THAT SUFFERED FROM (EBD) DISABILITY.

7. THE PRINCIPAL FAILED AND NEGLECTED TO CONTACT JANE DOE'S (LJ) MOTHER TIMELY. AS OF WHICH PRINCIPAL MS TOWNSELY MISSED THE OPPORTUNITY TO INFORM JANE DOE (LJ) MOTHER THAT A SEXUALLY ABUSE CONDUCT HAD OCCURRED WHICH INVOLVED HER CHILD, THIS ACTION VIOLATED THE SCHOOL POLICY.

CLAIM (2)

- 1) THE PRINCIPAL AT GREYNOLDS PARK ELEMENTARY SCHOOL AND THE MIAMI-DADE COUNTY SCHOOL BUS VIOLATED THE AMERICAN WITH DISABILITIES ACT. (ADA)
- 2) MIAMI -DADE COUNTY SCHOOL BUS FAILED THEIR DUTY OF CARING FOR THE SAFETY OF JANE DOE (LJ).
- 3) JANE DOE (LJ) WAS MOLESTED UNDER THE CARE OF THE MIAMI-DADE COUNTY SCHOOL BUS (DRIVER) AND THE BUS DRIVER (AIDE) THAT WAS SUPPOSED TO BEEN MONITORING THE STUDENT'S BEHAVIOR.
- 4) JANE DOE (LJ) WAS ONLY 5 YEARS OF AGE WHEN SHE WAS MOLESTED BY TWO OLDER STUDENTS ON THE SCHOOL BUS. THE MIAMI -DADE DISTRICT SCHOOL BUS DID NOT HAVE ANY SAFETY MEASURE THAT WAS IN PLACE THAT WOULD EACH STUDENT TO BE PAIR IN THEIR AGE GROUP.
- 5) THE BUS DRIVER AIDE FAILED TO CONDUCT A ROUTINE OF THE BUS, WHICH IS A PROCEDURE EMPHASIZED DURING THE BUS DRIVER AIDE TRAINING.
- 6) JANE DOE (LJ) WAS INTIMIDATED AND EMOTIONALLY DISTRESS AS SHE WAS FORCED TO BE ON THE SCHOOL BUS WITH HER ASSAILANT AFTER THE MOLESTED INCIDENT WAS REPORTED.
- 7) THE PRINCIPAL AND THE MIAMI-DADE COUNTY SCHOOL BUS DRIVER NOR THE BUS AIDE PROTECTED JANE DOE(LJ) FROM THE

STUDENT WHO MOLESTED JANE DOE(LJ). ALL PARTIES PROVIDED AN UNSAFE LEARNING ENVIRONMENT.

CLAIM (3)


1. THE PRINCIPAL MS JANINE ANN. TOWNSELY AT GREYNOLDS PARK ELEMENTARY SCHOOL VIOLATED TITLE VI (6) OF THE EDUCATION AMENDMENT 1972.
2. THE PRINCIPAL RETALIATED AGAINST JANE DOE (LJ) BECAUSE HER MOTHER CALLED THE MIAMI-DADE COUNTY SCHOOL BUS DISTRICT ADMINISTRATION TO COMPLAINT AND HAVE JANE DOE TO BE TRANSFER ON TO ANOTHER SCHOOL BUS UPON LEARNING THAT ONE OF THE STUDENTS WHO MOLESTED JANE DOE (LJ) REMAINED ON THE SCHOOL BUS.
3. THE PRINCIPAL MS JANINE ANN. TOWNSLEY RETALIATED BY PROVIDING JANE DOE'S (LJ) MOTHER MISLEADING INFORMATION ABOUT AN INDIVIDUALIZED EDUCATION PROGRAM (IEP) THAT THE SCHOOL PROVIDED FOR STUDENTS WHO HAVE DISABILITY.
4. THE PRINCIPAL MENTION THAT THE SCHOOL NO LONGER PROVIDED THE (IEP) PROGRAM THAT WAS HELD IN THE SCHOOL, DUE TO THIS INFORMATION JANE DOE (LJ) HAD TO BE WITHDRAWAL FROM THE SCHOOL.
5. JANE DOE (LJ) MOTHER WAS INFORM THAT THE SCHOOL STILL PROVIDED THE (IEP), (EBD) PROGRAM WHEN SHE ENROLLED JANE DOE (LJ) INTO ANOTHER SCHOOL THAT DID NOT PROVIDE THE PROGRAM THAT WAS NEED FOR JANE DOE (LJ).
6. THE PRINCIPAL MS TOWNSLEY EXCLUDED JANE DOE (LJ) FROM PARTICIPATE IN THE (IEP) PROGRAM WHICH SHE CLEARLY VIOLATED TITLE VI (6).MS TOWNSLEY CAUSED JANE DOE (LJ) TO BE VERY INTENTIONAL INFLICTIONS OF EMOTIONAL DISTRESS DUE TO HER BEING SURROUNDED BY NEW STUDENTS.

DEMAND FOR JURY TRIAL

AS A DIRECT AND PROXIMATE CAUSE OF THE MIAMI DADE COUNTY DISTRICT
SCHOOL BOARD BUS DRIVER / BUS AIDE AND THE SCHOOL PRINCIPAL AT
GREYNOLDS PARK ELEMENTARY SCHOOL.

PLANTIFF JANE DOE (LJ) DEMANDS A TRIAL BY JURY OF ALL SUCH CLAIMS AS
MAY BE SO TRIABLE AS OF RIGHT.

DATED: February 5, 2024


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